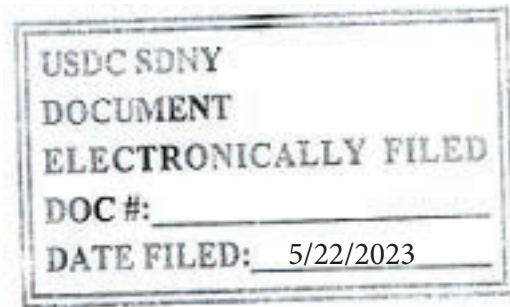


MEMO ENDORSED

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May 19, 2023

Via ECF Filing

The Honorable Nelson S. Roman
United State District Judge
Southern District of New York
Federal Building and United States Courthouse
300 Quarropas St.
White Plains, NY 10601-4150

Re: *United States v. Ysenni Gomez*, 22 Cr. 526 (NSR)

Dear Judge Roman:

I represent Ysenni Gomez in the above-referenced matter. I write now without opposition from the Government and Pretrial Services to request a modification to Ms. Gomez's bail conditions. The specific request is to amend the current requirement of home incarceration imposed upon Ms. Gomez and modify her conditions to home detention, as well as to continue accessing the internet on the approved device being monitored by Pretrial Services. This request is made in order to grant permission for Ms. Gomez to travel to and to attend a week-long training program called "The Wilderness Program" at Exodus, Transitional Community, Inc., located at 2271 Third Avenue, New York, NY 10035. The program includes soft-skills job-readiness training and group programs related to challenges of reentry, acceptance, guilt, and coping mechanisms to manage stress. Additionally, the program focusses on resume writing, job interview preparation and assists participants in obtaining gainful employment.

Ms. Gomez presently is on bail in the above-referenced matter with conditions of electronic monitoring with home incarceration. Pretrial Services Officer Jonathan Lettieri has advised me that Ms. Gomez remains in compliance with no issues to report. Furthermore, Officer Lettieri has informed me that Pretrial would prefer home detention to facilitate approval of her attendance to this program and any follow-up interviews and potential job placement which may result from the program. Additionally, it is requested that Ms. Gomez be permitted to continue

accessing the internet on the one approved device which is currently being monitored by Pretrial Services past the expiration of the pharmacy technician course which Ms. Gomez currently attends with approval of the Court. I have also communicated with AUSA Kaiya Arroyo regarding this request. AUSA Arroyo has indicated in an email that the Government has no objection to the proposed modification to amend Ms. Gomez's conditions from home incarceration to home detention or for Ms. Gomez to continue utilizing the approved device past the expiration of the pharmacy technician course.

Thank you for the Court's consideration of this request.

Respectfully Submitted,

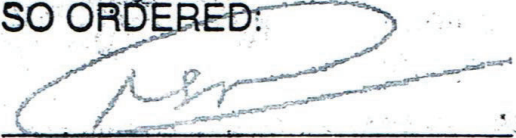
/s/ Lauren Di Chiara

CC: AUSA Kaiya Arroyo
Pretrial Services Officer Jonathan Lettieri
(both via ECF and email)

The Court GRANTS Defendant a temporary bail modification from the current requirement of home incarceration to home detention, however, only for the length of the week-long training program, "The Wilderness Program," to facilitate approval of her attendance to this program. Defendant is also GRANTED leave to continue accessing the internet on the approved device being monitored by Pretrial Services. The Gov't and the Pretrial Services Officer do not object to both requests. Clerk of Court is requested to terminate the motion at ECF No. 31.

**Dated: White Plains, NY
May 22, 2023**

SO ORDERED:


**HON. NELSON S. ROMAN
UNITED STATES DISTRICT JUDGE**